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**Subject:** Quick Summary of Interagency Call on AgWPS NPRM  
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All, I've prepped a quick summary of the interagency call on the WPS comments and our response. The 4<sup>th</sup> bullet below is a topic that OMB raised with me shortly after the interagency call concluded. If you think that I've omitted anything important, that an aspect of the summary needs to be clarified, or that I incorrectly captured anything, please let me know ASAP. Thanks!

*On Monday, December 9<sup>th</sup>, at 10:30 AM, EPA hosted an interagency teleconference to discuss comments on the WPS NPRM and EPA responses. In light of the OPM delayed opening operating status, some agencies were not represented during the discussion. Most of EPA's responses were accepted, and EPA agreed to make a few clarifying edits and minor caveats to the EA and to the preamble. In addition, the Labor Department requested revisions to the Fair Labor Standards Act discussion in the preamble, and is to provide language and context.*

*There are only a handful of topics that appear to require further discussion/explanation.*

- *FIFRA authority for minimum age provisions*
- *Analysis of impact on small farms (percent of all sources of farm revenues vs. percent of crop revenues)*
- *Information sources for protection of farm owners and their families (concern about gap in regulatory protection)*
- *Demonstration of anticipated rule effectiveness under EO 13563 without active rule enforcement (OMB to provide some ideas)*

*Since some agencies were unable to participate in the discussion, OMB has given them until tomorrow to provide any additional follow-up comments regarding the WPS proposed rule. Follow-up comments will be consolidated by OMB and provided to EPA without agency attribution.*

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